

1 William D. Hyslop  
2 United States Attorney  
3 Eastern District of Washington  
Stephanie Van Marter  
4 Assistant United States Attorney  
Post Office Box 1494  
5 Spokane, WA 99210-1494  
6 Telephone: (509) 353-2767

FILED IN THE  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

Oct 21, 2020

SEAN F. McAVOY, CLERK

8 UNITED STATES DISTRICT COURT  
9 FOR THE EASTERN DISTRICT OF WASHINGTON

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.  
13  
14  
15 AMADO DE LA MORA CARDENAS,  
16 [REDACTED]  
17 [REDACTED]  
18 [REDACTED] and  
19 [REDACTED]

20 Defendants.

4:20-CR-6028-SMJ-1

INDICTMENT

Vio.: 21 U.S.C. §§ 841(a)(1), (b)(1)(A)  
(viii), 846  
Conspiracy to Distribute 50 Grams  
or More of Actual (Pure)  
Methamphetamine  
(Count 1)

21 U.S.C. § 841(a)(1),  
(b)(1)(A)(viii)  
Distribution of 50 Grams or More  
of Actual (Pure)  
Methamphetamine  
(Counts 2, 3)

21 U.S.C. § 841(a)(1),  
(b)(1)(A)(viii)  
Possession with Intent to  
Distribute 50 Grams or More of  
Actual (Pure) Methamphetamine  
(Count 4)

21 U.S.C. § 841(a)(1),  
(b)(1)(B)(viii)  
Possession with Intent to

1 Distribute 5 Grams or More of  
2 Actual (Pure) Methamphetamine  
3 (Count 5)

4 21 U.S.C. § 853  
5 Forfeiture Allegations

6 The Grand Jury charges:

7 COUNT 1

8 Beginning on a date unknown, but by April 2020, and continuing until on or  
9 about September 24, 2020, in the Eastern District of Washington and elsewhere, the  
10 Defendants, AMADO DE LA MORA CARDENAS, [REDACTED]

11 [REDACTED] [REDACTED] [REDACTED]  
12 [REDACTED] and [REDACTED] and other individuals,  
13 both known and unknown to the Grand Jury, did knowingly and intentionally combine,  
14 conspire, confederate and agree together with each other to commit the following  
15 offense: distribution of 50 grams or more of actual (pure) methamphetamine, a  
16 Schedule II controlled substance, in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(A)(viii),  
17 846.  
18

19 COUNT 2

20 On or about July 14, 2020, in the Eastern District of Washington, the  
21 Defendants, [REDACTED] and [REDACTED]  
22 [REDACTED] did knowingly and intentionally distribute 50 grams or more of actual  
23 (pure) methamphetamine, a Schedule II controlled substance, in violation of 21  
24 U.S.C. § 841(a)(1), (b)(1)(A)(viii).

25 COUNT 3

26 On or about July 28, 2020, in the Eastern District of Washington, the  
27 Defendants, [REDACTED] and [REDACTED]  
28 [REDACTED] did knowingly and intentionally distribute 50 grams or more of actual

1 (pure) methamphetamine, a Schedule II controlled substance, in violation of 21  
2 U.S.C. §§ 841(a)(1), (b)(1)(A)(viii).

3 COUNT 4

4 On or about September 25, 2020, in the Eastern District of Washington, the  
5 Defendants, [REDACTED] and  
6 AMADO DE LA MORA CARDENAS, knowingly and intentionally possessed with  
7 intent to distribute 50 grams or more of actual (pure) methamphetamine, a Schedule II  
8 controlled substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(A)(viii), and 18  
9 U.S.C. § 2.

10 COUNT 5

11 On or about September 25, 2020, in the Eastern District of Washington, the  
12 Defendant, [REDACTED] did knowingly and intentionally  
13 possess with the intent to distribute 5 grams or more of actual (pure) methamphetamine,  
14 a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(B)(viii).

16 NOTICE OF CRIMINAL FORFEITURE

17 The allegations contained in this Indictment are hereby realleged and  
18 incorporated by reference for the purpose of alleging forfeiture.

19 Pursuant to 21 U.S.C. § 853, upon conviction of an offense(s) in violation of  
20 21 U.S.C. § 841, as set forth in Counts 1, 2, 3, 4 and 5, of this Indictment, the  
21 Defendants, AMADO DE LA MORA CARDENAS, [REDACTED]

22 [REDACTED] and [REDACTED] shall  
23 forfeit to the United States of America, any property constituting, or derived from,  
24 any proceeds obtained, directly or indirectly, as the result of such offense(s) and  
25 any property used or intended to be used, in any manner or part, to commit or to  
26 facilitate the commission of the offense(s). The assets to be forfeited include, but  
27 are not limited to:

**Defendant**

\$35,890.00 U.S. currency

If any of the property described above, as a result of any act or omission of the Defendant(s):

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p) and 28 U.S.C. § 2461(c).

DATED this \_\_\_\_ day of October 2020.

A TRUE BILL

## Foreperson

**William D. Hyslop  
United States Attorney**

Stephanie Van Marter  
Assistant United States Attorney